

Attachment 1

Amount in Controversy

1. The plaintiff has lost several hundreds of thousands of dollars of property and has also been excluded from an inheritance of at least \$100,000, as a result of the defendant's tortfeasances targeting the plaintiff.

2. The plaintiff estimates that the (1) property loss and (2) the removal of his name from his grandmother's will, has resulted in \$250,000 - \$350,000 in damages.

3. Based on these figures, if simple treble damage calculations were applied, the defendant is liable to the plaintiff for \$750,000 - \$1,050,000, without even addressing the applicability of punitive damages in a case where the defendant's conduct is so wilful and gregarious.

4. The plaintiff submitted a Freedom of Information Act and Privacy Act Request (FOIPA) to (1) the Department of Homeland Security, and (2) the Federal Bureau of Investigation on Wednesday, January 18, 2017, and has requested copies of all communications between agency personnel and Mary Elizabeth Solomon Crane (a.k.a. "Mary Crane").¹

5. The plaintiff believes that damages and/or the extent of involvement of other parties, will best determined once the scope of the defamation per se, is verified and determined through the discovery process, and the FOIPA requests.

¹ The FOIPA request clearly stated that the requestor was seeking copies of any and all reports, comments, statements, interactions or complaints made by the defendant Mary Elizabeth Solomon Crane (a.k.a. Mary Elizabeth Crane and Mary Crane) to DHS and FBI personnel, in addition to any contractors in their employ.